

# PRIVACY STATEMENT

Moët Hennessy Nederland B.V.

Version 1.0

# Content

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# 1. Definitions

For the purpose of this Statement the following definitions apply:

- “Personal Data”: any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is a natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- “Processing”: any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data.
- “Controller”: a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- “Processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- “Recipient”: a natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities is in compliance with the applicable data protection rules according to the purposes of the processing.
- “Third party”: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- “Customer”: the natural or legal person Moët Hennessy Nederland B.V. has made an offer to or concluded an agreement with.

## 2. Introduction

This is the Privacy Statement of Moët Hennessy Nederland B.V. (hereinafter: 'Moët Hennessy' or 'we'/'us'/'our'), registered in the Netherlands with the Chamber of Commerce under number 32027920 and whose registered office is at Oude Utrechtseweg 22-24 (3743 KN) in Baarn, the Netherlands. We are committed to safeguarding the privacy of our customers, suppliers, employees, applicants and website visitors. This Privacy Statement sets out how we will treat your personal data and information.

We treat the Personal Data with the greatest care and, in doing so, comply with the applicable laws and regulations, including the General Data Protection Regulation (GDPR). That means, among other things, that Moët Hennessy:

- Informs you in a comprehensible and transparent way on how and for which purposes Personal Data are processed;
- Processes Personal Data only for well-defined purposes and the processing of data is based on one of the basis referred to in the GDPR;
- Takes appropriate security measures to protect Personal Data from loss or theft;
- Informs you of your rights regarding the Personal Data which are processed by Moët Hennessy.

The above subjects are dealt with in this Privacy Statement. This Statement consists of three parts.

- A.** In **Part A**, we explain how Moët Hennessy deals with Personal Data which are processed under the agreement(s) between Moët Hennessy and Customers. In this part it is also discussed for which purpose and on what basis Personal Data of Users are processed, and what the term of the storage is.
- B.** In addition to Personal Data of Users processed by Moët Hennessy, we also process a number of other sets of Personal Data, including Personal Data of our suppliers, applicants and visitors of our website. In **Part B** we explain how we deal with those other sets of Personal Data.
- C.** **Part C** contains a number of general provisions that show, inter alia, how we protect your Personal Data, your rights and who you can contact with regard to questions about this Privacy Statement.

### 2.1. Lawful processing

Moët Hennessy ensures that any person acting under the authority/on behalf of Moët Hennessy, to the extent they have access to Personal Data of Customers, shall only process the data by prior order of Moët Hennessy, unless different statutory provisions apply. The data will only be processed by persons that have signed a confidentiality statement.

Moët Hennessy also ensures that it shall only process Personal Data in a lawful way that is not incompatible with the purpose they were received for. The Personal Data must be adequate and relevant with regard to the purposes for which they are processed; and will not be processed excessively in the relation to the purpose they were collected for.

This Privacy Statement is concluded by and managed under the Management Board of Moët Hennessy.

## 3. Part A

### 3.1. Personal Data processed through the administrative system of Moët Hennessy

#### *Categories of Personal Data*

To be able (to continue) to deliver the products and services, as the Customers of Moët Hennessy are used to from us, Moët Hennessy shall store in their administrative system the following Personal Data of the (contact person(s) of) Customers:

- First and last name;
- Position;
- Address (residence, street name and number with postcode);
- (Mobile) phone number;
- Email address;
- Signature;
- (Digital) correspondence;
- Graydon reports;
- History of payment;

#### *Purpose*

The abovementioned data is processed (stored) for the following purposes:

- Sale of products;
- Accounting (invoice processing);
- Maintaining business relationships (customer network);
- Providing service and support to Customers;
- Digital direct marketing (newsletter).

Moët Hennessy shall process the Personal Data for this purpose only.

#### *Basis*

The above mentioned data processing is necessary for the implementation of the (collaboration) agreement concluded between Moët Hennessy and Customers and the filled in 'new clients-forms', so that Moët Hennessy will be able (to continue) to provide its products, services and support to the Customers. If you fill in the 'new clients-form', Moët Hennessy also has a legitimate interest to process the Personal Data provided in this form. This is necessary for a proper handling of your request. For receiving the newsletter, the recipients have given permission and the newsletter contains the option to unsubscribe. Moët Hennessy shall not use the Personal Data of Customers saved by Moët Hennessy in its administrative system for acts/conduct that are in breach with the applicable statutory provisions.

#### *Storage term*

We will delete your Personal Data from our administrative system if we receive the order by the Customer or there is no more legal basis to process the Personal Data.

## 4. Part B

### 4.1. Data of visitors of the website of Moët Hennessy

We are committed to safeguarding the privacy of our website visitors. By visiting <http://www.veuve-clicquot.nl/> (our "Site"), you are accepting and consenting to the practices described in this Privacy Statement.

#### WHAT INFORMATION DO WE COLLECT?

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We may collect, store and use the following kinds of Personal Data (non-exhaustive list):

- information that you provide to us when 'asking for a quote' (including your name, telephone number and email address);
- information that you provide to us for the purpose of subscribing to the Site, our newsletters and email services; and
- any other information that you send to us or we collect about you (e.g. IP addresses).

Please note if you are entering details on behalf of others you must receive their prior consent.

#### HOW DO YOU USE MY PERSONAL DATA?

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We will process and use your Personal Data for the following purposes:

- As required to fulfil a contract with you. This includes operations to handle orders, deliver products and services, process payments, communicate with you about you orders and generally to maintain and administer your account with us.
- Where we are required to do so by law. This includes for the purposes of legal claims and compliance (including disclosure of such information in connection with legal process or litigation).
- Where it is in our legitimate interests to do so and where these interests are not overridden by your data protection rights. This includes operations to know your preferences better, serve you with meaningful content and advertising or ensure the security and integrity of our website.
- With your consent. This includes situations where you consent to the use of cookies, for example, to gather management information to form statistical and trend analysis.

We will, in addition to the purposes noted above, use your email address to send you updates, news and other special offers relating to Moët Hennessy products and services that we think may be of interest to you, if you have "opted-in". You are therefore given the option to receive these emails.

You can unsubscribe from our emailing list at any time using the "Unsubscribe" link in our emails, or when applicable by accessing your account.

We may also anonymize and aggregate your information so we can administer and improve our Site.

When we ask you to supply us with Personal Data we will make it clear where there is a statutory or contractual (mandatory) requirement to provide Personal Data and the consequences of not providing the data (for example, that we will not be able to process your order).

## **DATA RETENTION**

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Data is retained for a period appropriate to the purposes for which it was collected and is, by default, destroyed at the end of a one (1) year period of inactivity following its collection date unless otherwise provided by law.

Please note however that appropriate data related to subscription of current services (e.g. brand newsletters) will be deleted one (1) month after you have notified us that you want to unsubscribe to such services.

## **ARE CHILDREN ALLOWED TO USE THE SITE?**

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The Site is aimed at individuals over the age of eighteen (18) years of age.

We do not sell products or services for purchase by children.

All individuals are required to enter their date of birth upon entering the Site.

## **RECIPIENTS OF PERSONAL DATA**

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The website may contain links to other websites for reference purposes only. We are not responsible for the content, privacy notices or practices of third party websites in these circumstances. Please contact them directly for more information.

## **WHAT ABOUT COOKIES?**

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A cookie consists of information sent by a web server to a web browser, which is then stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. Most browsers allow you to refuse to accept cookies.

## **COOKIES – WHAT ARE THEY?**

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A "cookie" is a piece of information, like a tag, that's stored on your computer, tablet or phone when you visit a website. It can help identify your device – like your PC or mobile phone – whenever you visit that website.

They are used by most major websites including this Site. To make the best use of our Site, on whichever device you use, you'll need to make sure your web browser is set to accept cookies.

## **WHAT ARE COOKIES USED FOR?**

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We use cookies and some other data stored on your device to:

- give you a better online experience
- allow you to set personal preferences
- protect your security
- measure and improve our service
- track and measure marketing trends

## SO WHAT INFORMATION IS KEPT BY THE COOKIE?

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A cookie will typically hold:

- the name of the website that it has come from
- how long the cookie will stay on your device (e.g. computer or phone)
- a value – usually a randomly generated unique number

## THE COOKIES WE SET

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We use the following categories of cookies on our Site:

- **Category 1: Strictly Necessary Cookies**

These cookies are essential in order to enable you to move around the Site and use its features. Without these cookies, services you have asked for such as remembering your product selection cannot be provided.

- **Category 2: Performance Cookies**

These cookies collect anonymous information on how people use our Site. For example, we use Google Analytics cookies to help us understand how customers arrive at our Site, browse or use our Site and highlight areas where we can improve areas such as navigation, shopping experience and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established. For more information on Google Analytics cookies, see the official Google Analytics page. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

- **Category 3: Functionality Cookies**

These cookies remember choices you make such as items you place in your basket, the country you visit our Site from, language and search parameters such as size, colour or product line. These can then be used to provide you with an experience more appropriate to your selection and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

- **Category 4: Targeting cookies or advertising cookies**

These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers. For example, we use third party companies to provide you with more personalised adverts when visiting other websites.

- **Category 5: Social Media Cookies**

These cookies allow you to share what you've been doing on the Site on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

Other ways we make our online service easier to use include using cookies that:

- make the page load quickly by sharing the workload across computers.
- make sure our pages are optimised for your browser or device by giving us technical information about the device or browser you are using.



## HOW LONG DO COOKIES STAY ON MY COMPUTER

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Session cookies – these only last until you close your browser. They are not stored on your hard drive. They are usually used to track the pages that you visit so that information can be customised for you for that visit.

Persistent cookies – these are stored on your hard drive until you delete them or they reach their expiry date. These may, for example, be used to remember your preferences when you use the Site.

We will not store cookies information for longer than 2 years.

## HOW DO COOKIES AFFECT MY PRIVACY

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We protect your Personal Data very carefully. The security and safety of your Personal Data is very important to us. We may ask you for Personal Data so you can communicate with our customer services team, for security reasons or so you can use our services.

## SAFETY AND SECURITY

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Some cookies help make sure your information is secure when using our services while keeping our forms and catalogue site easy to use.

## IMPROVING OUR SERVICE

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We also use cookies to measure and analyse how visitors use the Site. This helps us develop it and make it easier to use.

## WHAT CAN I DO TO MANAGE COOKIES STORED ON MY COMPUTER OR PHONE

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You can accept or refuse cookies. Accepting cookies is usually the best way to make sure you get the best from a website. Most PCs automatically accept them but you can change your browser settings to restrict, block or delete cookies if you want.

Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences. Many browsers have universal privacy settings for you to choose from. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## WHAT HAPPENS IF I DON'T ACCEPT COOKIES?

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If you decline cookies, some aspects of the Site may not work on your computer or mobile phone and you may not be able to access areas you want on the website. For this reason we recommend that you accept cookies.

## 4.2. Data of suppliers of goods and services to Moët Hennessy

### *Categories of Personal Data*

If Moët Hennessy enters into a business relationship with a supplier, the following Personal Data of (the contact person(s) of) the supplier may be processed:

- First and last name;
- Position;
- Address (residence, street name and number with postcode);
- Bank account number(s);
- (Mobile) phone number;
- Purchase data;
- Email address;
- Signature;
- (Digital) correspondence;
- History of payment;

### *Purposes*

Moët Hennessy processes the abovementioned Personal Data for the following purposes:

- Purchasing products and/or services;
- Processing of invoices;
- Maintenance of the business network of Moët Hennessy;
- Providing service and support.

Moët Hennessy shall process the Personal Data for these purposes only.

### *Basis*

The abovementioned data processing is necessary for the implementation of the (collaboration) agreement concluded between Moët Hennessy and the supplier and the filled in 'new vendor-forms', so that Moët Hennessy will be able (to continue) to do business with the supplier. If you fill in the 'new vendor-form', Moët Hennessy also has a legitimate interest to process the Personal Data provided in this form. This is necessary for a proper handling of your request. Moët Hennessy shall not use the Personal Data of suppliers saved by Moët Hennessy in its administrative system for acts/conduct that are in breach with the applicable statutory provisions.

### *Storage period*

The Personal Data necessary to fulfil the administration obligation shall be stored for the statutory period. Other Personal Data will be deleted after the termination of the relationship with our suppliers.

### 4.3. Data of applicants

#### *Categories of Personal Data*

If you apply for a job with Moët Hennessy, Moët Hennessy will process the following Personal Data

- First name and surname;
- E-mail address;
- Date of birth;
- Gender;
- Nationality;
- Address (residence, street name and number with postcode);
- Curriculum Vitae (CV);
- Application letter;
- References;
- (Mobile) phone number.

#### *Purposes*

The abovementioned Personal Data are processed to ensure that application procedures run smoothly. This way, we can contact you to make an appointment or provide feedback and we can assess your profile with regard to the position you applied for.

#### *Basis*

If you apply with us, Moët Hennessy has a legitimate interest to process the abovementioned Personal Data. This processing is necessary to ensure that the application procedure runs smoothly.

#### *Storage period*

Your Personal Data will be deleted four weeks after the vacancy has been filled, unless you give permission for storing the Personal Data for a longer period (with a maximum of 1 year).

### 4.4. Data of Moët Hennessy employees

We process Personal Data of our employees. Processing of those data is excluded from this Privacy Statement. Upon employment, we explain to our employees how we deal with their Personal Data and provide them with a separate Privacy Statement pertaining to the processing of Personal Data of employees.

## 5. Part C

### 5.1. How secure is the data that you keep about me?

We will take technical and organizational precautions to prevent the loss, misuse or alteration of your Personal Data. We will store all the Personal Data you provide on our secure (password and firewall protected) servers.

We reserve the rights to refuse access to the Site or remove or edit content at our discretion.

### 5.2. Recipients of personal data

In accordance with the law, we may share your Personal Data with:

- Other Moët Hennessy brands or entities (such as for e.g. Moët Hennessy Österreich GmbH, Moët Hennessy Belux S.A., Moët Hennessy Czech Republic S.R.O., Moët Hennessy Danmark A/S, Moët Hennessy Suomi OY, MHD Moët Hennessy Diageo, Moët Hennessy Deutschland GmbH, Jas Hennessy & Co. Limited, Moët Hennessy Italia S.P.A., Moët Hennessy (Nederland) B.V., Moët Hennessy Norge AS, Moët Hennessy Polska spolka zoo, Moët Hennessy Distribution Rus, Moët Hennessy España SA, Moët Hennessy Sverige AB, Moët Hennessy (Suisse) SA, Moët Hennessy Turkey Saraplar & Alkollu Ickiler TIC LTD STI) to provide joint content and services.
- Law enforcement or governmental agencies, or authorized third-parties, in response to a verified request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability.
- The purchaser, or prospective purchaser of any business or asset which we are, or are contemplating selling.

### 5.3. Data transfers

We may transfer Personal Data to countries outside the European Economic Area ("EEA"), including to countries which have different data protection standards to those which apply in the EEA. We have put in place European Commission approved standard contractual clauses to protect this data. You have a right to ask us for a copy of these clauses (by contacting us as set out below).

### 5.4. Amendments

We may update this Privacy Statement from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our Privacy Statement by email.

## 5.5. Your rights

You may request a copy and details of your personal information, to correct it, erase it or to transfer it to other organizations at your request. You also have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent.

In particular, you have rights to object to direct marketing at any time. Where we process your data because we have a legitimate interest in doing, you also have a right to object to this. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data.

Please contact us at [nederland@moethennessy.com](mailto:nederland@moethennessy.com) or write to us at Moët Hennessy Nederland, Oude Utrechtseweg 22-24 (3743 KN) in Baarn, the Netherlands if you would like us to access your data.

We hope that we can satisfy queries you may have about the way we process your data. However, if you have unresolved concerns you also have the right to complain to data protection authorities.

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## 5.6. Updating Information about myself

Please let us know if the Personal Data, which we hold about you, needs to be corrected or updated by contacting Moët Hennessy at the address below.

## 5.7. Controller of Personal data & questions

The data controller responsible for our Site is Moët Hennessy Nederland B.V.. Should you have any questions about this Privacy Statement or our treatment of your Personal data, please write to us by email: [nederland@moethennessy.com](mailto:nederland@moethennessy.com) or by post to us at: Oude Utrechtseweg 22-24 (3743 KN) in Baarn, the Netherlands.

Moët Hennessy's Group Data Protection Officer
<ul style="list-style-type: none"><li>• Post: 58 Avenue de la Grande Armée – 75017 PARIS - France</li><li>• Email: <a href="mailto:contactdpo@moethennessy.com">contactdpo@moethennessy.com</a></li><li>• Phone: + 33 (0) 1 58 97 66 66</li></ul>



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This Privacy Statement shall take effect as of the 18<sup>th</sup> of April 2018. The Privacy Statement can be consulted and downloaded for free via our website: <http://www.veuve-clicquot.nl/>

This Privacy Statement was last updated in April 2018